

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	
Penny S. McCague,)	Case No. 19-21166-CMB
<i>Debtor</i>)	
)	
Steidl & Steinberg, P.C.,)	Chapter 13
<i>Movant</i>)	
)	Related to Document Nos. 78 & 79
)	
Penny S. McCague and)	
Ronda J. Winnecour, Chapter 13)	
Trustee,)	
<i>Respondents</i>)	

**MOTION FOR EXPEDITED HEARING REGARDING MOTION TO WITHDRAW AS
DEBTOR'S COUNSEL AND MOTION TO CANCEL HEARING SCHEDULED FOR
MARCH 11, 2020**

AND NOW, comes the movant, Steidl and Steinberg, P.C., by and through its attorney, Lauren M. Lamb, Esquire, and respectfully represents as follows:

1. Movant filed a Motion to Withdraw as Debtor's Counsel on January 28, 2020 at docket number 78.
2. As per Local Rules, Movant self-scheduled a response deadline of February 14, 2020 and a hearing date and time of March 11, 2020 at 10:00am at docket number 79.
3. Debtor has the following hearings scheduled prior to or at the same time as the hearing on the Motion to Withdraw as Debtor's Counsel:
 - a. Fourth continued hearing regarding Debtor's Objection to Claim 2 of U.S. Bank National Association scheduled for February 19, 2020 at 11:00am
 - b. Third continued hearing regarding Debtor's Objection to Claim 3 of LSF9 master Participation Trust scheduled for March 11, 2020 at 10:00am

c. Second contested confirmation hearing regarding Debtor's Chapter

13 Plan Dated April 30, 2019 scheduled for March 11, 2020 at

10:00am

4. Movant does not feel that it can effectively represent Debtor at these hearings due to the circumstances that led to the filing of the Motion to Withdraw as Debtor's Counsel.
5. If an expedited hearing is not granted, Debtor may be harmed by the inability to retain replacement counsel or represent herself at these hearings.
6. The need for an expedited hearing has not been caused by any lack of due diligence on the part of the attorney or the attorney's client, but has been brought about solely by circumstances beyond their control.

WHEREFORE, the movant, Steidl & Steinberg, P.C. respectfully requests this Honorable Court cancel the hearing scheduled for March 11, 2020 at 10:00am regarding Movant's Motion to Withdraw as Debtor's Counsel and schedule an expedited hearing prior to February 19, 2020 at 11:00am.

Respectfully Submitted,

January 30, 2020

DATE

/s/Lauren M. Lamb

Lauren M. Lamb, Esquire
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